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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JUAN COLIN-LEON,

Plaintiff,

vs.

CARDENAS MARKETS, LLC d/b/a  
CARDENAS MARKETS, a foreign limited-  
liability company; DOE CARDENAS  
EMPLOYEES 1-10, DOE INDIVIDUALS 1-  
10, and ROE ENTITIES 1-10, inclusive,

Defendants.

Case No.: 2:24-cv-01212-GMN-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY (FIRST  
REQUEST)**

In accordance with the Local Rule of Practice for the United States District Court for the District of Nevada ("LR") IA 6-1 and 26-3, Plaintiff, JUAN COLIN-LEON, by and through his counsel of record, JACOB S. SMITH, ESQ., of the law firm of HENNESS & HAIGHT, and Defendant CARDENAS MARKETS, LLC d/b/a CARDENAS MARKETS, by and through its counsel of record, JONATHAN C. PATTILLO, ESQ., of the law firm of WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP, hereby stipulate and agree to an extension of all remaining discovery deadlines by sixty (60) days. The parties propose the following revised discovery plan. This is the first stipulation to extend discovery.

**DISCOVERY COMPLETED TO DATE**

- Plaintiffs have served Initial FRCP Disclosures;
- Defendant has served Initial FRCP Disclosures, and two additional supplements;

1 • Defendants have propounded written discovery requests to Plaintiff to which Plaintiff  
2 has responded;

3 • Plaintiffs have propounded Requests for Production to Defendant to which Defendant  
4 has yet to respond;

5 **DISCOVERY TO BE COMPLETED**

6 • Defendant intends to take the deposition of Plaintiff which is currently scheduled for  
7 December 12, 2024.

8 • Plaintiff intends to take the deposition of Cardenas Markets, LLC d/b/a Cardenas  
9 Markets' FRCP 30(b)(6) deponent(s);

10 • Plaintiff intends to take deposition of current and former Cardenas Markets, LLC d/b/a  
11 Cardenas Markets' employees;

12 • Defendant intends to take the deposition of particular medical providers;

13 • Both parties reserve the right to take other depositions as discovery continues;

14 • The parties have yet to retain experts. The parties will retain and disclose expert  
15 witnesses and may depose their respective experts;

16 • The parties intend to serve, and respond to, additional written discovery.

17 **REASONS FOR EXTENSION TO COMPLETE DISCOVERY**

18 The parties make this request in good faith, and because good cause exists to extend  
19 these deadlines. Specifically, the parties intended for the discovery set forth above to be  
20 completed within the existing discovery period, however, the current timeline does not allow  
21 the parties to effectively conduct discovery within this time period.

22 Defendant wishes to take the deposition of Plaintiff with sufficient time to obtain the  
23 deposition transcripts and provide them to Defendant's expert(s) prior to the initial expert  
24 disclosure deadline. The first available date of deposition that worked for all parties is  
25 December 12, 2024, which is after the current expert disclosure deadline.

26 Further, Plaintiff wishes to depose the Cardenas employees who responded to the  
27 subject incident to gather their knowledge as to the subject incident and any subsequent  
28

investigation prior to the disclosure of experts. Those depositions have not yet been able to be scheduled.

Accordingly, the parties have agreed to continue the discovery and other deadlines by sixty (60) days to allow this fact discovery to take place prior to the disclosure of experts.

**PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

Scheduled Event	Current Deadlines	Proposed Deadline
Amend Pleadings/Add Parties	November 5, 2024	closed
Initial Expert Disclosures	December 5, 2024	February 3, 2025
Rebuttal Expert Disclosures	January 6, 2025	March 7, 2025
Close of Discovery	February 3, 2025	April 4, 2025
Dispositive Motions	March 5, 2025	May 5, 2025
Pretrial Order	April 4, 2025	June 3, 2025

DATED this 14th day of November, 2024.

HENNESS & HAIGHT

/s/ Jacob S. Smith, Esq.

JACOB S. SMITH, ESQ.  
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*Attorneys for Plaintiff*

DATED this 14th day of November, 2024.

WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP

/s/ Jonathan C. Pattillo, Esq.

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LLC d/b/a Cardenas Markets*

*Juan Colin Leon vs. Cardenas Markets, LLC d/b/a Cardenas Markets*  
*Case No. 2:24-cv-01212-GMN-EJY*

**ORDER**

**IT IS HEREBY ORDERED:**

The discovery cut off is extended from February 3, 2025 to April 4, 2025 in which all discovery in this action shall be completed;

**IT IS FURTHER OREDERED:**

Plaintiffs and Defendant shall disclose their experts to each other at least sixty (60) days before the discovery cut-off date, which is by February 3, 2025, and Plaintiffs and Defendant shall disclose rebuttal experts at least thirty (30) days after the initial date for disclosure of experts, which is March 7, 2025;

All pre-trial motions, including but not limited to, discovery motions, motions to dismiss, and motions for summary judgment shall be filed and served no later than thirty (30) days after the close of discovery, which is May 5, 2025;

The Joint Pre-Trial Order in the above-captioned action shall be filed with this Court no later than thirty (30) days after the date set for filing dispositive motions, which shall be June 3, 2025; and

The last day for the parties to file their Motion and/or Stipulation to Extend Discovery shall be twenty (20) days prior to the discovery cut off, which is March 17, 2025.

IT IS SO ORDERED this 15th day of November, 2024.

  
UNITED STATES MAGISTRATE JUDGE